

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

JOSE M. FELICIANO,)	
)	
Plaintiff,)	No. 12-cv-10232
)	
v.)	The Honorable Manish S. Shah
)	
MICHELLE BROWN, SHENEQUIA FORD,)	
NAGIB ALI, M.D., MOHAMED)	
MANSOUR, M.D.,)	
)	
Defendants.)	

**JOINT MOTION TO AMEND THE DISCOVERY SCHEDULE
DUE TO TRANSITION TO NEW DEFENSE COUNSEL**

The parties, by their respective counsel, jointly and respectfully submit this motion requesting that the Court enter an order amending the discovery schedule as set forth below, in light of the transition of the case to new counsel for the defendants.¹ In support of this joint motion, the parties state the following:

1. Since July 19, 2015, Assistant State's Attorney Conor Fleming had been acting as counsel primarily responsible for representing the defendants in this case. *See* Doc. 97 (Appearance of Conor Fleming).
2. As of September 9, 2016, Mr. Fleming has moved on to other employment and is no longer employed by the Cook County State's Attorney's office. Accordingly, Mr. Fleming will no longer be the defense counsel primarily responsible for this case.

¹ Since this case is presently set for a status hearing on Thursday morning, September 22, at 9:30 a.m., the parties will note this joint motion for hearing at that time in order to avoid unnecessarily adding an additional matter to the Court's schedule.

3. Assistant State's Attorney Anthony Zecchin is in the process of reassigning this case, as well as Mr. Fleming's other cases, to other attorneys within the Cook County State's Attorney office.

4. Mr. Zecchin and Plaintiff's counsel have communicated regarding these developments, including discussing a mutually-agreeable adjustment to the discovery schedule, to allow the newly-assigned Assistant State's Attorney to get up to speed and to allow the parties to complete fact and expert discovery.

5. In addition, prior to Mr. Fleming's departure, the parties had engaged in discussions regarding possibilities for resolution of this matter. Extending the schedule will also provide the opportunity to further explore possible resolution.

6. The current discovery deadlines set by the Court's May 16, 2016 Order are as follows:

- Fact Discovery Deadline – September 30, 2016
- Affirmative Expert Reports Exchanged – November 4, 2016
- Rebuttal Expert Reports Exchanged – December 2, 2016
- Expert Discovery Deadline – December 16, 2016

7. For the reasons set forth above, the parties jointly and respectfully request that this Court amend the current discovery schedule as follows:

- Fact Discovery Deadline – December 16, 2016
- Affirmative Expert Reports Exchanged – February 3, 2017
- Rebuttal Expert Reports Exchanged – March 3, 2017
- Expert Discovery Deadline – March 17, 2017

8. No party will be prejudiced by this amendment. The parties' respective counsel have conferred regarding the proposed amendment to the discovery schedule and neither side has any objection and both sides agree to the amended schedule.

9. This Motion is not being filed for purposes of undue delay or any other improper motive.

For these reasons, the parties, by their respective counsel, jointly and respectfully request that the Court enter an order granting this motion and amending the discovery schedule as set forth above.

Dated: September 13, 2016

Jointly and respectfully submitted,

COUNSEL FOR DEFENDANTS

/s/ Anthony Zecchin

Anthony Zecchin (ARDC No. 6257706)
Assistant State's Attorney
RICHARD J. DALEY CENTER,
50 W. WASHINGTON ST, Room 500
CHICAGO, IL 60602
(312) 603-3373
anthony.zecchin@cookcountyl.gov

COUNSEL FOR PLAINTIFF

/s/ David C. Scott

Amy M. Rubenstein (ARDC No. 6278353)
David C. Scott (ARDC No. 6279758)
Schiff Hardin LLP
233 South Wacker Drive, Suite 6600
Chicago, Illinois 60606
(312) 258-5500
arubenstein@schifhardin.com

dscott@schiffhardin.com

CERTIFICATE OF SERVICE

I, David C. Scott, an attorney, hereby certify that on September 13, 2016, with the consent of counsel for the defendants, I electronically filed a copy of the foregoing joint motion with the Clerk of the Court using the ECF System, which will send notification of such filing to those attorneys registered to receive notices.

/s/ David C. Scott

David C. Scott